

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

ELMER CAMBELL, ET AL., :  
:  
Plaintiffs, :  
:  
v. : CASE NO. C-1-01-527  
:  
INTERNATIONAL PAPER, : J. Beckwith; Mag. J. Hogan  
SUN CAPITAL PARTNERS, INC. :  
SMART PAPERS, :  
:  
Defendants. :

**NOTICE OF MANUAL FILING**

Please take notice that because of the voluminous nature of the exhibits and appendix to its Motion for Summary Judgment, Defendant International Paper is filing its Motion, its accompanying exhibits and appendix manually pursuant to Section IV A of the Electronic Filing Policies and Procedures Manual for the United States District Court for the Southern District of Ohio. The Motion for Summary Judgment and Memorandum in Support thereof are also being submitted electronically.

Respectfully submitted this 30th day of September, 2003.

/s Michael A. Roberts

Michael Roberts, Esq.  
Graydon Head & Ritchey, LLP  
1900 5th 3rd Center  
511 Walnut Street  
Cincinnati, Ohio 45202  
(513) 629-2799

W. Carter Younger, Esq. (admitted *pro hac vice*)  
Vincent J. Miraglia, Esq. (admitted *pro hac vice*)  
McGuireWoods LLP  
1050 Connecticut Avenue  
Washington, DC 20036  
(202) 857-1704

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2003, a copy of the foregoing was sent via hand delivery to:

Randolph H. Freking, Esquire  
Freking & Betz  
214 East Ninth Street, 5<sup>th</sup> Floor  
Cincinnati, Ohio 45202

/s Michael A. Roberts